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Attorneys for Defendants
Valley Health System, LLC,
d/b/a Centennial Hills Hospital Medical Center;
and Jill McAtee, RN

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

AMY VILELA, an individual;
 JOZETTE FIGUEREDO, an individual;
 AMY VILELA, as Special Administrator of the
 Estate of SHALYNNE RAMOS,

vs.

VALLEY HEALTH SYSTEM, LLC, d/b/a
 CENTENNIAL HILLS HOSPITAL
 MEDICAL CENTER, a Nevada Limited Liability
 Company; UNIVERSAL HEALTH SERVICES
 OF DELAWARE, INC., a Delaware corporation;
 VALLEY HOSPITAL MEDICAL CENER, INC.,
 a Nevada Corporation, EMCARE, INC., a
 Delaware Corporation; TANYA NETZ PAC; JILL
 MCATEE, RN; DOE DEFENDANTS I through
 X, inclusive; ROE NURSES I through XX,
 inclusive; ZOE HOSPITALS or OTHER
 MEDICAL FACILITIES I through X; and ROE
 CORPORATIONS I through X, inclusive,

Defendants.

CASE NO.: 2:16-cv-01503-RFB-CWH

**STIPULATION AND PROPOSED
 ORDER:**

- (1) **DISMISSING JILL MCATEE,
 RN**
- (2) **DISMISSING UNIVERSAL
 HEALTH SERVICES OF
 DELAWARE, INC.**
- (3) **DISMISSING VALLEY
 HOSPITAL MEDICAL
 CENTER, INC.**

Plaintiffs Amy Vilela ("Viela"), Jozette Figueredo ("Figueredo"), Amy Vilela as the
 Special Administrator of the Estate of Shalynne Ramos (the "Ramos Estate") (collectively

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1 “Plaintiffs”); and Defendants Valley Health System, LLC, d/b/a Centennial Hills Hospital
 2 Medical Center (“Valley Health LLC”), Valley Hospital Medical Center, Inc. (“Valley Hospital
 3 Inc.”), Universal Health Services of Delaware, Inc. (“UHS of Delaware”), and Jill McAtee, RN
 4 (“McAtee”) (collectively “Valley Health Defendants”) hereby stipulate as follows:

- 5 (1) Valley Health LLC is the appropriate Valley Health Defendant to be named with
 6 respect to the allegations in Plaintiff’s Complaint.
- 7 (2) UHS of Delaware and Valley Health LLC are not alter egos of one another, and UHS
 8 of Delaware and Valley Health LLC are not agents of one another in any capacity.
 9 Plaintiffs shall therefore dismiss their claims against UHS of Delaware without
 10 prejudice.
- 11 (3) Valley Hospital Inc. and Valley Health LLC are not alter egos of one another, and
 12 Valley Health Inc. and Valley Health LLC are not agents of one another in any
 13 capacity. Plaintiffs shall therefore dismiss their claims against Valley Hospital Inc.
 14 without prejudice.
- 15 (4) McAtee was acting within the course and scope of her employment with Valley
 16 Health LLC during all times relevant to the allegations in Plaintiffs’ Complaint.
 17 Plaintiffs shall therefore dismiss their claims against McAtee without prejudice.

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(5) Should discovery reveal new information indicating that McAtee, UHS of Delaware, or Valley Hospital Inc. are proper Defendants to this action, Plaintiffs reserve their right to move for amendment of their Complaint in a manner consistent with the Federal Rules of Civil Procedure. Should Plaintiffs amend their Complaint to include any of these parties, the law firm of Hall Prangle & Schoonveld shall accept service of process on their behalf.

IT IS SO STIPULATED:

HALL PRANGLE & SCHOONVELD, LLC

LAW OFFICES OF CASEY D. GISH

/s/ Ryan T. O'Malley

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Attorneys for Defendants Valley Health System, LLC, d/b/a Centennial Hills Hospital Medical Center; and Jill McAtee, RN

/s/ Casey D. Gish

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Attorneys for Plaintiffs

ORDER

Pursuant to the terms of the attached stipulation, the Court orders as follows:

1. Plaintiffs' claims against Defendant Jill McAtee, RN are dismissed without prejudice.
2. Plaintiffs' claims against Defendant Universal Health Services of Delaware, Inc. are dismissed without prejudice.
3. Plaintiffs' claims against Defendant Valley Hospital Medical Center, Inc. are dismissed without prejudice.



RICHARD F. BOULWARE, II

United States District Judge

DATED this 6th day of October, 2016.